

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

LEAGUE OF WOMEN VOTERS OF
MISSOURI, ST. LOUIS A. PHILIP
RANDOLPH INSTITUTE, and
GREATER KANSAS CITY A.
PHILIP RANDOLPH INSTITUTE,

Plaintiffs,

v.

No. 2:18-cv-04073-BCW

JOHN R. ASHCROFT,
in his official capacity as the Missouri
Secretary of State, and

JOEL W. WALTERS,
in his official capacity as the Director
of the Missouri Department of
Revenue,

Defendants.

Notice of 30(b)(6) Deposition

TO: Joel L. Walters, in his official capacity as the Director of the Missouri
Department of Revenue
by his attorneys, David D. Dean
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PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), the undersigned will take the deposition, on oral examination before a stenographer, of the Missouri Department of Revenue (“DOR”), on July 26, 2018, commencing at 1:00 p.m., at the Office of the Missouri Attorney General, 221 West High Street, Jefferson City, Missouri 65101, and continuing between the hours of 8:00 a.m. to 6:00 p.m. from day to day thereafter until completed. Such deposition is intended to be used for any lawful and proper purposes, including use at trial as evidence.

Pursuant to Rule 30(b)(6), Defendant Walters shall designate one or more officers, directors, managing agents, or other persons who shall be designated to testify on behalf of the DOR, regarding all information known or reasonably available, with respect to the following:

1. How DOR’s online change-of-address (“COA”) system functions, including interaction with other COA systems such as the National Change of Address System, and data concerning COA from three separate methods of COA identified in the Wisch Declaration (Doc. 47-1).
2. How DOR currently processes and transmits voter registration information and updates for existing Missouri registered voters that are submitted during transactions conducted in person, online, or by mail, including as

- part of Form 4317 and 4318, to update a DOR client's residential or mailing address information.
3. The content and accessibility of information DOR maintains in its own customer files including mail, phone, and email contact information and voter registration information.
 4. How, if at all, DOR currently interacts with local election officials concerning questions about whether a voter is registered and/or should have their ballot or provisional ballot counted.
 5. Means to implement, and expenses of and burden associated with, implementing relief to address the violations alleged in Plaintiffs' Preliminary Injunction Motion and the attendant Suggestions in Support, including, but not limited to, the Plaintiffs' Proposed Preliminary Injunction Remedy and the remedial systems described in the Wisch Declaration (Doc. 47-1).

To the extent that more than one deponent is identified, Defendant Walters shall state in advance of the deposition which portions of this notice each deponent is prepared to address. This deposition is limited in the above-noted topics and is taken based upon agreement of the parties that any remaining portion of this deposition may be taken at a later date prior to any trial on the merits.

Respectfully Submitted,

/s/ Gillian R. Wilcox
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Attorneys for Plaintiffs

- * Admitted *pro hac vice*
- ** Not admitted in the District of Columbia;
practice limited pursuant to D.C. App.
R.49(c)(3).
- *** Admission pending

CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2018, a copy of the foregoing was served on counsel of record by operation of the Court's CM/ECF system.

/s/ Gillian R. Wilcox